

5. Defendant Keefer was personally served with a copy of the Summons and Amended Complaint on November 1, 2022, and proof of service was filed with this Court on November 4, 2022. (Doc. No. 41.)

6. More than 21 days have passed since Defendant Keefer was served with the Summons and Amended Complaint; however, Defendant Keefer has not filed a responsive pleading.

For these reasons, Plaintiff asks the Clerk to enter a default against Defendant Keefer in this matter. Plaintiff is filing herewith the unsworn declaration required by L.R. 55.01 in support of this Motion.

Respectfully Submitted,

COUNTERPOINT LEGAL, PLC

By: /s/ Elizabeth S. Tipping
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on this the 10th day of February, 2023, via the Court's electronic filing system on the following:

Phillip G. Young, Jr.
Thompson Burton PLLC
1801 West End Avenue, Suite 1550
Nashville, TN 37203
phillip@thompsonburton.com

and via United States First Class mail, postage prepaid on the following:

Bretton Keefer
5554 Pumpkintown Lane
Lafayette, TN 37083

Afsoon Hagh
Hagh Law PLC
226 Pelham Drive
Brentwood, TN 37027-4237

/s/ Elizabeth S. Tipping